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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HR-12

1 SEP 1988

Mr. David C. Bach
Ethyl Corporation
Ethyl Tower
451 Florida
Baton Rouge, Louisiana 70801-1780

Re: Freedom of Information Act
Request No. RIN 658-88

Dear Mr. Bach:

This is in response to your Freedom of Information Act (FOIA) request of March 10, 1988, regarding the Ethyl Corporation facility in Sauget, Illinois.

Enclosed is a copy of the Preliminary Assessment Report dated May 14, 1987, in response to your request. There is no charge for providing the above document since the total fee in connection with the request is less than \$25.00.

Please contact Alan Altur, of my staff, at (312) 886-0390 if you have any questions or are in need of further assistance.

Sincerely yours,

A handwritten signature in cursive script, which appears to read "Thomas Kerschecker", is written over the typed name.

Mary A. Gade, Acting Director
Office of Superfund

Enclosure

SEP 07 1988



Executive Summary

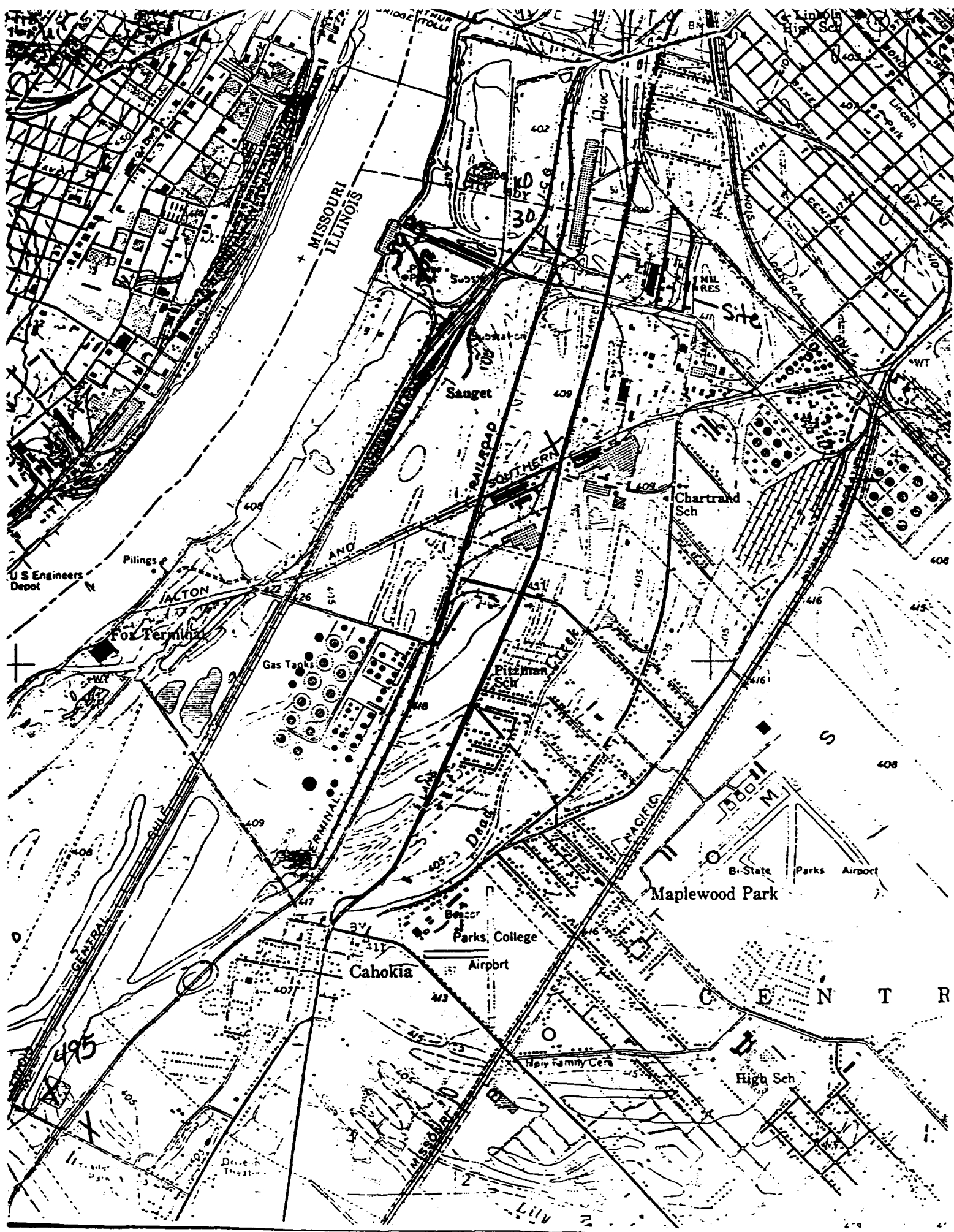
Ethyl Petroleum Additives (formerly Edwin Cooper) in Sauget, Illinois is owned by the Ethyl Corporation for the manufacturing of petroleum additives. The facility was part of Monsanto Chemical Company's operations before selling it to Ethyl Petroleum in 1971.

The site has a drum storage area for the storing of waste naptha and waste lab solvents in 55 gallon drums. The waste lab solvents are generated when solvents are used to clean equipment and waste naptha comes directly from a process unit. Several other materials may become waste after being used in certain processes. These waste are mostly off-specification materials and raw materials that have become outdated.

An inspection on July 11, 1985 revealed four (4) drums of wastes that were leaking in the storage area. The waste was found on the concrete pad that contained the drums and on the nearby gravel. These drums were also incorrectly labeled because no hazardous waste labels with accumulation dates were placed on them. The IEPA inspector had the facility overpack the drums and clean-up the area around the drums.

Soil samples taken in 1983 confirmed the presence of 2,3,7,8, - TCDD contamination. The contamination came from the manufacturing of Agent Orange when Monsanto owned the facility. Groundwater monitor wells were drilled on-site to determined if contaminants had affected the water table. The results from the monitor wells samples indicated no contamination by 2,3,7,8-TCDD. The facility also had on air release, that affected the nearby population. On July 11, 1983, a reaction of sulfur dichloride and a water/sodium hydroxide solution produced a brownish-yellow plume that traveled north toward Rush City. Approximately 113 people were treated for eye irritations, breathing difficulties and nausea. Thirteen (13) were admitted and kept overnight for observation at St. Mary's Hospital in East St. Louis.


A low priority is recommended for this facility due to the fact that extensive soil sampling has taken place at the site. Surface drainageways and groundwater samples may need to be taken an analyzed for the Hazardous Compound Target List, instead of only 2,3,7,8-TCDD.



60061 - further location of Laquinta

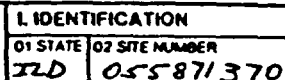
How
Med
4/14/87

RECEIVED

 1631210013		POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 1 - SITE INFORMATION AND ASSESSMENT		IDENTIFICATION 01 STATE 02 SITE NUMBER 1408755871370		MAY 2 1987	
II. SITE NAME AND LOCATION							
01 SITE NAME (Legal, common, or descriptive name of site) Ethyl Petroleum Additives				02 STREET, ROUTE NO., OR SPECIFIC LOCATION (City, State, Zip) Monsanto Avenue			
03 CITY Sauget		04 STATE IL		05 ZIP CODE 62201		06 COUNTY St. Clair	
07 COORDINATES LATITUDE 38 36 04.3		LONGITUDE 090 10 06.0		07 COUNTY CODE 163		08 CONG DIST 21	
10 DIRECTIONS TO SITE (Showing from nearest public road) (See attached map)							
III. RESPONSIBLE PARTIES							
01 OWNER (if known) Ethyl Corporation				02 STREET (Business, mailing, residential) 451 Florida			
03 CITY Baton Rouge		04 STATE LA		05 ZIP CODE 70801		06 TELEPHONE NUMBER ()	
07 OPERATOR (if known and different from owner) (Specify)				08 STREET (Business, mailing, residential) (Specify)			
09 CITY (Specify)		10 STATE (Specify)		11 ZIP CODE (Specify)		12 TELEPHONE NUMBER ()	
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ (Agency name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER: _____ (Specify) <input type="checkbox"/> G. UNKNOWN							
14 OWNER/OPERATOR NOTIFICATION ON FILE (Check of that apply) <input checked="" type="checkbox"/> A. RCRA 3001 DATE RECEIVED: 11/13/84 MONTH DAY YEAR <input type="checkbox"/> B. UNCONTROLLED WASTE SITE (RCRA 106) DATE RECEIVED: _____ MONTH DAY YEAR <input type="checkbox"/> C. NONE							
IV. CHARACTERIZATION OF POTENTIAL HAZARD							
01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES DATE 07/15/74 MONTH DAY YEAR <input type="checkbox"/> NO 03/20/86				02 BY (Check of that apply) <input type="checkbox"/> A. EPA <input type="checkbox"/> B. EPA CONTRACTOR <input checked="" type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify) CONTRACTOR NAME(S): _____			
03 SITE STATUS (Check one) <input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		04 YEARS OF OPERATION BEGINNING YEAR 1971 ENDING YEAR _____ <input type="checkbox"/> UNKNOWN					
05 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED Sludge (Persistent) other Organic chemicals (Toxic) Oily Waste (Ignitable) Solvents (Toxic)							
06 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION Groundwater (Population, Environment) Vapor Release (Population, Environment) Surface Water (Population, Environment)							
V. PRIORITY ASSESSMENT							
01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents) <input type="checkbox"/> A. HIGH (Inspection required promptly) <input type="checkbox"/> B. MEDIUM (Inspection required) <input checked="" type="checkbox"/> C. LOW (Inspection on time available basis) <input type="checkbox"/> D. NONE (No further action needed, complete current disposition form)							
VI. INFORMATION AVAILABLE FROM							
01 CONTACT Mr. M.J. Bonaventure		02 OF (Agency/Organization) Ethyl Petroleum Additives				03 TELEPHONE NUMBER 16181274-4000	
04 PERSON RESPONSIBLE FOR ASSESSMENT Gregory W. Dunn		05 AGENCY IEPA		06 ORGANIZATION RPMS		07 TELEPHONE NUMBER 2171782-6761	
				08 DATE 05/14/87 MONTH DAY YEAR			

EPA FORM 2070-12 (7-81)

00780 MB



03 WASTE CHARACTERISTICS

<input checked="" type="checkbox"/> A TOXIC	<input type="checkbox"/> E SOLUBLE	<input type="checkbox"/> I HIGHLY VOLATILE
<input type="checkbox"/> B CORROSIVE	<input type="checkbox"/> F INFECTIOUS	<input type="checkbox"/> J EXPLOSIVE
<input type="checkbox"/> C RADIOACTIVE	<input type="checkbox"/> G FLAMMABLE	<input type="checkbox"/> K REACTIVE
<input checked="" type="checkbox"/> D PERSISTENT	<input checked="" type="checkbox"/> H IGNITABLE	<input type="checkbox"/> L INCOMPATIBLE
		<input type="checkbox"/> M NOT APPLICABLE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE	Unknown	CY	Diatomaceous Earth Filter Cake
OLW	OILY WASTE	Unknown	GA	Waste Oil
SOL	SOLVENTS	Unknown	GA	Waste Lab Solvents
PSO	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS	Unknown	GA	Waste Naptha; Benzene
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS			

[illegible]

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

Illinois EPA Land Files.



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
IL 055871370

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☒ A. GROUNDWATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: ≈ 30 04 NARRATIVE DESCRIPTION

Groundwater monitor wells were installed on-site to determine if 2,3,7,8-TCDD had migrated to the water table. Sample results detected NO contaminants but were only analyzed for 2,3,7,8-TCDD.

01 ☒ B. SURFACE WATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: unknown 04 NARRATIVE DESCRIPTION

Most soil samples were taken within 1 foot of the surface. 2,3,7,8-TCDD was found within this depth. Surface water run-off could carry contaminants to nearby surface water bodies used for recreation.

01 ☒ C. CONTAMINATION OF AIR 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: ≈ 30,000 04 NARRATIVE DESCRIPTION

Past incidents suggest that future air contamination could occur from this site. See "I" below.

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☐ E. DIRECT CONTACT 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☒ F. CONTAMINATION OF SOIL 02 ☒ OBSERVED (DATE: 1983) ☐ POTENTIAL ☐ ALLEGED
03 AREA POTENTIALLY AFFECTED: unknown 04 NARRATIVE DESCRIPTION

Soil sample results from an area suspected of mixing components of agent orange, confirmed the presence of 2,3,7,8-TCDD in measurable quantities.

01 ☒ G. DRINKING WATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

See "A" above.

01 ☐ H. WORKER EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 WORKERS POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☒ I. POPULATION EXPOSURE/INJURY 02 ☒ OBSERVED (DATE: 07/11/83) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 113 04 NARRATIVE DESCRIPTION

On July 11, 1983 a reaction of Sulfur dichloride and a water/sodium Hydroxide solution (this was to clean a sulfur dichloride tank) created a yellowish plume that left the plant grounds and headed toward Rush City. The cloud created eye irritation, difficulty breathing, and nausea. 113 people were admitted to the hospital.



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER

IL 055871370

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ K. DAMAGE TO FAUNA
04 NARRATIVE DESCRIPTION (include names of species)

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ L. CONTAMINATION OF FOOD CHAIN
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☒ M. UNSTABLE CONTAINMENT OF WASTES
(Spills, runoff, standing liquids, leaking drums)

02 ☒ OBSERVED (DATE: 7/11/85)

☐ POTENTIAL

☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: UNKNOWN

04 NARRATIVE DESCRIPTION:

Inspection of the drum storage area produced two drums which were overfilled and were leaking onto the ground.

01 ☐ N. DAMAGE TO OFFSITE PROPERTY
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

III. TOTAL POPULATION POTENTIALLY AFFECTED: 30,000

IV. COMMENTS

Soil sample results have documented contamination by 2,3,7,8-TCDD. No contamination was found in the groundwater.

V. SOURCES OF INFORMATION (List specific references, e.g., state files, sample analyses, reports)

Illinois EPA Land Files.